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10	Attorneys for Defendants	
11	[additional counsel on signature page]	
12		
13	UNITED STATES DISTRICT COURT	
14	NORTHERN DISTRI	CT OF CALIFORNIA
15 16 17 18 19 20 21 22 23 24 25 26 27	MICHAEL DRIEU, Individually and On Behalf of All Others Similarly Situated, Plaintiff, v. ZOOM VIDEO COMMUNICATIONS, INC., ERIC S. YUAN, and KELLY STECKELBERG, Defendants. KIM BRAMS, Individually and On Behalf of All Others Similarly Situated, Plaintiff, v. ZOOM VIDEO COMMUNICATIONS, INC., ERIC S. YUAN, and KELLY STECKELBERG, Defendants.	Case No. 3:20-CV-02353-JD STIPULATION AND [PROPOSED] ORDER CONSOLIDATING CASES, EXTENDING TIME TO RESPOND TO COMPLAINT, AND CONTINUING CASE MANAGEMENT CONFERENCE Case No. 3:20-CV-02396-JD

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STIPULATION AND [PROPOSED] ORDER CONSOLIDATING CASES; CASE NO. 20-CV-2353-JD & 20-CV-2396 JD

1	1.	Pending before this Court are two putative securities class action lawsuits brought
2	against Zoon	n Video Communications, Inc. ("Zoom") and certain of its officers: Drieu v. Zoom
3	Communicati	ions, Inc., et al., No 20-CV-02353-JD ("Drieu") and Brams v. Zoom Communications,
4	Inc., et al., N	Io. 20-CV-02396-JD ("Brams"). The cases are related within the meaning of Civil
5	L.R. 3-12.	
6	2.	On April 8, 2020, plaintiff in Drieu (the first-filed action) published notice of the
7	action in acco	ordance with the Private Securities Reform Act of 1995, 15 U.S.C. §78u-4, et seq. The
8	PSLRA gives members of the putative class sixty days after the notice is published to move for	
9	appointment as lead plaintiff. Once applications for lead plaintiff are closed, the district court must	
10	determine who among the movants is the "most adequate plaintiff." 15 U.S.C. §78u-4(a)(3)(B)(ii)	
11	3.	The parties anticipate that <i>Drieu</i> and <i>Brams</i> will be consolidated under Fed. R. Civ.
12	P. 42(a), that	this Court will appoint a lead plaintiff in accordance with the PSLRA, and that the
13	lead plaintiff	will desire to file a single consolidated complaint or designate one of the complaints
14	as the operati	ve complaint.
15	4.	Defendants wish to continue the date for any response to a complaint until a lead
16	plaintiff is ap	pointed, and the lead plaintiff either files a consolidated complaint or designates an
17	existing comp	plaint as the operative complaint.
18	5.	Because this action is governed by the PSLRA, it is subject to a mandatory stay of
19	all discovery	pending determination of a motion to dismiss. As such, the parties believe it would
20	save judicial	and party resources to continue the Case Management Conference in Drieu set for
21	July 9, 2020,	until after Defendants' anticipated motion to dismiss is resolved.
22	6.	No party has previously requested or received time for an extension to respond to
23	the complain	t.
24		STIPULATION
25	THE	REFORE, IT IS HEREBY STIPULATED, by and between the undersigned counsel
26	for the parties	s, that:
27	1.	Pursuant to Fed R. Civ. P. 42(a), the <i>Drieu</i> and <i>Brams</i> actions as well as any related

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actions that are subsequently filed in or transferred to this District are CONSOLIDATED for all

1	purposes (to	gether, the "Consolidated Act	tion"). The consolidated action shall be captioned: "In re
2	Zoom Securities Litigation" and shall be maintained under Master File No. 3:20-CV-02353-JD		
3	Case 3:20-CV-02396-JD shall be administratively closed.		
4	2.	Defendants are not require	ed to respond to the complaint in any action consolidated
5	into this act	ion, other than a consolidate	d complaint or a complaint designated as the operative
6	complaint.		
7	3.	Within ten (10) days after	the Court appoints a lead plaintiff, the lead plaintiff and
8	Defendants will submit to the Court a proposed schedule for the filing of a consolidated complain		
9	and the time	for Defendants' response the	ereto.
10	4.	Subject to approval of the	Court, the Case Management Conference set for July 9
11	2020 in <i>Drie</i>	eu, shall be continued to a da	te following the resolution of any motion to dismiss the
12	consolidated complaint.		
13	5.	Defendants deny the alleg	ations in the complaints and expressly reserve all rights
14	defenses and or other objections to the complaints, except insufficient service of process.		
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16	Dated: May	6, 2020	COOLEY LLP
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18			/s/ Patrick E. Gibbs Patrick E. Gibbs
19			Attorneys for Defendants Zoom Video
20			Communications, Inc., Eric S. Yuan, Kelly Steckelberg
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w		STIPLE ATION AND [PROPOSED] ORDER

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15		Attorneys for Plaintiff Kim Brams
16		
17	Pursuant to Civil Local Rule 5-1(i)(3), all	signatories concur in filing his stipulation.
18	Dated: May 6, 2020	
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20		/s/Patrick E. Gibbs Patrick E. Gibbs
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AW		STIPULATION AND [PROPOSED] ORDER

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I	Case 3:20-cv-02353-JD Document 18 Filed 05/06/20 Page 6 of 6
1	[PROPOSED] ORDER
2	
3	PURSUANT TO STIPULATION, IT IS SO ORDERED.
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6	DATED:, 2020
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8	HONORABLE JAMES DONATO
9	UNITED STATES DISTRICT JUDGE
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